

DECLASSIFIED

Proposed Gulfco Response Approach
Enforcement Confidential

1. PRPs provide information that there is a bona-fide prospective purchaser for the southern portion of the site with a land-use that is appropriate for the zoning requirements.
2. If PRPs are unable to provide the above purchaser information, then proceed under the existing UAO on an accelerated schedule for the entire site.
3. If the PRPs are able to provide the purchaser information, then proceed as follows:
 - a. Accelerate the risk assessment for the surface in the southern parcel of the site (south of Marlin Ave.).
 - b. If the surface of the southern parcel is below the risk range, then develop an AOC to do a removal for the tanks in the southern parcel and the buried drums in the northern parcel, and require placement of ICs; *however*, if the surface is not below the risk range, then continue under the UAO on an accelerated schedule without an AOC or removal.
 - c. Prepare an EE/CA for the non-time critical removal, and complete removals & placement of ICs for the southern parcel.
 - d. Continue the RI/FS under the UAO for the north parcel and for site-wide ground water.
 - e. Modify deliverables under the UAO as necessary to accommodate the north/south split.
 - f. Split the site into two OUs: (1) for the surface in the southern parcel; and (2) for the northern parcel surface & site-wide ground water.
 - g. Prepare a no-action Proposed Plan & ROD for OU1 (surface of southern parcel).
 - h. Prepare a partial deletion for OU1.
 - i. Prepare a Proposed Plan & ROD for OU2 (surface of northern parcel & site-wide ground water) when the RI/FS is complete. Include mitigation of wetland damage resulting from the former parking lot located north of Marlin Ave by restoring the wetlands in the former parking lot area (between Marlin Ave. and the former impoundments).



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